

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

The Financial Oversight And Management * PROMESA
Board for Puerto Rico * Title III
as representative of *
* No. 17 BK 328-LTS
The Commonwealth of Puerto Rico, et *
*

OPOSITION TO THREE HUNDRED FORTY-FIFTH OMNIBUS OBJECTION (SUBSTANTIVE)
OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY, AND THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO MISCLASSIFIED
CLAIMS.

To the Honorable United States District Court, Judge Laura Taylor Swain:

Gisela Vázquez Rodríguez, through his lawyer, Lcdo. Carlos I. León Camacho, filled this Opposition to the three hundred forty-fifth omnibus objection:

1. We received the objection claiming certain claims are reclassified. Specifically, it is requested to reclassify claim number 34338 of Gisela Vázquez Rodríguez from secured one to an unsecured one. The basis for the reclassification request, is that the claimant failed to provide *prima facie* evidence to support a secured claim.
2. In this case the Honorable Court of First Instance from Bayamón in the case number DAC2014-0647 issue a Judgement granted the payment of the appraised value of a certain impounded vehicle or the return of the vehicle by the Commonwealth of Puerto Rico. The court also ordered the payment of the prevailing legal interest in accordance with the Civil Procedure Rules.
3. That Judgement constitute *prima facie* evidence to support a secured claim.

4. In view of the foregoing, we oppose to the reclassification of the claim number 34338 in favor of Gisela Vázquez Rodríguez, from a secured one to an unsecured one.

THEREFORE, very respectfully requested of this Honorable Court to granted this Motion.

RESPECTFULLY SUBMITTED.

Certify: send copy to: Lcdo. Herman D. Bauer, Lcda. Carla García Benítez, Lcdo. Gabriel A. Miranda, Bufete Oneill & Borges LLC, 250 Avenida Muñoz Rivera, local 800, San Juan, PR 00918-1813 y a Lcdo. Martin J. Bienenstock, Lcdo. Brian S. Rosen, PROSKAUER ROSE LLP, Eleven Times Square, New York, NY 10036.

In Toa Alta, Puerto Rico this day of June, 29, 2021.



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